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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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REBEKAH R. JOHNSON,	)	Cause No. CV _____
	)	
Plaintiff,	)	
	)	<b>COMPLAINT AND JURY</b>
vs.	)	<b>TRIAL DEMAND</b>
	)	
UNITED STATES OF AMERICA,	)	
Defendant.	)	

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Plaintiff alleges as follows:

1. This action arises under the Federal Tort Claims Act (28 U.S.C.A. §§ 1346(b), 2671 et. seq.). The amount in controversy exceeds \$75,000.00. Plaintiff has previously submitted her claim to the United States Department of Interior, Bureau of Land Management on August 9, 2012 by way of Standard Form 95. Her claim for personal injury and related damages was denied by defendant by way of letter dated November 28, 2012. Plaintiff has exhausted all federal administrative agency requirements.

2. On August 17, 2010, plaintiff Rebekah R. Johnson was operating a vehicle traveling southbound on Highway 312 at approximately 4:43 p.m. in Billings, Montana. At that location, Highway 312 turns into Main Street. At the same time, Rob Roy Williams, an employee of the United States of America and specifically the Bureau of Land Management of the United States Department of Interior, acting within the scope of his employment relationship with the United States of America, negligently attempted to turn left onto Highway 87 North and in doing so, hit plaintiff Rebekah R. Johnson's vehicle in the side of her vehicle causing it to spin sideways and hit a third vehicle driven by Doreen M. Savaria of Billings, Montana.

3. As a direct result of the negligence of Rob Roy Williams and the United States of America, plaintiff Rebekah R. Johnson was injured and has incurred and continues to incur medical expenses, lost income and other special and general compensatory damages including but not limited to permanency of injury, pain and suffering, emotional distress and loss of the ability to enjoy certain life activities.

WHEREFORE, plaintiff Rebekah R. Johnson prays for Judgment against the United States of America in the amounts proven and established at the time of trial and for such other relief as the Court deems proper under the circumstances.

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**DEMAND FOR TRIAL BY JURY**

Plaintiff demands trial by jury of this cause.

**DATED** this 4<sup>th</sup> of December, 2012.

STACEY & FUNYAK

By: /s/ Calvin J. Stacey  
Calvin J. Stacey  
Stacey & Funyak  
Attorneys for Plaintiff